

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

KATIA HILLS,

Plaintiff,

-against-

AT&T MOBILITY SERVICES LLC a/k/a
AT&T MOBILITY LLC,

Defendant.

Civil No.: 3:17-cv-00556-JD-MGG

DECLARATION OF GILLIAN THOMAS

I, Gillian Thomas, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct:

1. My name is Gillian Thomas, and I am a Senior Staff Attorney at the ACLU Women's Rights Project.
2. As lead counsel to Plaintiff Katia Hills in this litigation, I have personal knowledge of the facts and information set forth in this Declaration.
3. Attached as "Exhibit A" is AT&T's Company Owned Retail (COR) Sales Attendance Guidelines for All COR Enterprise Non-Exempt Employees, Effective October 17, 2011.
4. Attached as "Exhibit B" is AT&T Mobility Company Owned Retail (COR) Sales Attendance Guidelines for All COR Enterprise Non-Management Employees, Effective May 1, 2015.

5. Attached as “Exhibit C” are excerpted portions of the deposition transcript of former AT&T employee Jason Jenkins, taken on August 20, 2020.

6. Attached as “Exhibit D” are excerpted portions of the rough deposition transcript of AT&T employee Dion McGlown, taken on September 8, 2020.

7. Attached as “Exhibit E” are excerpted portions of the rough deposition transcript of AT&T employee Gregory Roberts, taken on August 28, 2020.

8. Attached as “Exhibit F” are excerpted portions of the deposition transcript of AT&T employee Mickenzie A. Yoder, taken on August 4, 2020.

9. Attached as “Exhibit G” are excerpted portions of the deposition transcript of Plaintiff Katia Hills, taken on July 8, 2020.

10. Attached as “Exhibit H” are excerpted portions of the deposition transcript of AT&T employee Heather Miller, taken on May 28–29, 2020 in related litigation.

11. Attached as “Exhibit I” are the materials from AT&T’s Job Accommodation Training for Supervisors from June 14, 2014.

12. Attached as “Exhibit J” is AT&T’s Equal Employment Opportunity (EEO) and Harassment Policies from May 2014.

13. On September 16, 2019, I sent Plaintiff’s First Request for Production of Documents (“Exhibit K”) to defense counsel, including Kenneth Gage, Alison Lewandoski, Brian Hayes, and Alex Maturi. The discovery requests at issue in this Motion to Compel are contained in Exhibit K.

14. I conferred with opposing counsel by email on numerous occasions, both before and after Defendant produced, in part, the requested data and other discovery in this case.

Attached as “Exhibit L” is a certification of the dates and times when I conferred with opposing counsel on the discovery matters at issue in the present motion.

Dated: September 14, 2020

/s/ Gillian Thomas
Gillian Thomas